

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 0:18-cv-01776 (JRT-HB)

**DECLARATION OF ERIC
SCHACHTER IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
APPROVAL OF NOTICE PLAN
AND CLAIMS PROCESS**

I, Eric Schachter, declare and state as follows:

1. I am a Vice President with A.B. Data, Ltd. (“A.B. Data”). A.B. Data was selected by Direct Purchaser Plaintiffs to act as the Settlement Administrator¹ in this matter and recently completed the Court-approved notice plan for settlements reached with the JBS and Smithfield Defendants (the “Settlements”). I am fully familiar with the facts contained herein based upon my personal knowledge, and if called as a witness, could and would testify competently thereto.

2. In consultation with Interim Co-Lead Counsel, I have prepared a proposed notice plan and claims administration process to distribute the Settlement Proceeds to Settlement Class members. This Declaration will describe the proposed notice plan and how it will provide due process to the potential members of the Settlement Class. This Declaration is based upon my personal knowledge and upon information provided to me by Interim Co-Lead Counsel, my associates, and A.B. Data staff members.

3. I have implemented and coordinated some of the largest and most complex class action notice and administration plans in the country. The scope of my work includes notification, claims processing, and distribution plans in all types of class actions, including but not limited to consumer, antitrust, securities, ERISA, insurance, and government agency settlements.

4. A.B. Data has also been appointed as notice, claims, and/or settlement administrator in hundreds of high-volume consumer, antitrust, civil rights, insurance,

¹ Unless otherwise noted, all capitalized terms shall have the same meaning as in the Settlement Agreement between Direct Purchaser Plaintiffs and Smithfield.

ERISA, securities, and wage and hour class action cases. A profile of A.B. Data's background and capabilities, including representative case and client lists, is included as **Exhibit A**.

NOTICE PLAN

5. The proposed notice plan includes direct notice by mail and/or email to approximately 55,000 potential Settlement Class members identified through the previous notice plans for the Settlements. To supplement this direct notice and reach the potential members of the Settlement Class who may not receive direct notice, A.B. Data will implement a print and digital media campaign as discussed below.

6. Direct notice will be provided via a Long Form notice (attached as **Exhibit B**) and claim packet (the "Notice Packet"), that will be mailed to approximately 55,000 Settlement Class Members with a known mailing address and posted on the case-specific website, www.porkantitrustlitigation.com. A.B. Data will track any mail returned as undeliverable by the United States Postal Service ("USPS"), and using third-party information providers to which we subscribe, attempt to ascertain an updated address and resend the Notice Packet.

7. An Email Notice, attached as **Exhibit C**, will be sent to the approximately 3,000 Settlement Class Members with a known email address. A.B. Data implements certain best practices to increase deliverability and bypass SPAM and junk filters, and we will be able to verify how many emails were successfully delivered.

8. The Notice Packet and Email Notice sent directly to potential members of the Settlement Class will include summary information concerning the claims process and

Interim Lead Counsel's motion for interim payment of attorneys' fees, reimbursement of current and ongoing litigation expenses, and service award payments to the Class Representatives. The notices will also inform Settlement Class Members of: how to participate in the claims process; how to object to the motion for interim payment of attorneys' fees, current and ongoing litigation expenses, and service awards; and will provide the date, time, and place of the hearing on the motion, and any Settlement Class member objections raised thereto.

9. To supplement the direct notice efforts, A.B. Data will publish a Publication Notice, attached as **Exhibit D**, one time in *Supermarket News* and *Nation's Restaurant News*. *Supermarket News* is a trade journal targeting retail grocer executives and wholesale buyers. *Nation's Restaurant News* is a trade journal targeting management in large multi-unit national chain restaurants and onsite food service facilities like hotels, clubs, and healthcare. A.B. Data will also implement a digital media banner ad campaign on the websites for each of these trade journals (www.supermarketnews.com and www.nrn.com).

10. The Claim Form (attached as **Exhibit E**) included in the Notice Packet will be personalized to include each Settlement Class member's annual purchase information with respect to each Defendant and Co-Conspirator, based on the Defendants' and Co-Conspirators' records. Settlement Class members who disagree with or wish to supplement the known purchase information will be able to do so by completing a Purchase Audit Request Form, attached as **Exhibit F**. The Claim Form will also contain a personal Unique ID number that can be utilized to file claims online through the case website. Prepopulating the Claim Form with known purchase information will simplify the claims process for most

Settlement Class members by eliminating the need for them to independently verify all Settlement Class purchases.

WEBSITE AND TELEPHONE

11. To assist potential members of the Settlement Class with inquiries, A.B. Data will continue to maintain the case-specific toll-free telephone number and a case-specific website. Both are available in English and Spanish.

12. The toll-free telephone number is equipped with an automated interactive voice response system. The automated interactive voice response system presents callers with a series of choices to hear prerecorded information. If callers need further help, they will have an option to speak with a live operator during business hours. The prerecorded information will be updated with information concerning the claims process.

13. The case-specific website, www.porkantitrustlitigation.com, will be updated to include the relevant information and documents related to the claims process and the motion for interim payment of attorneys' fees, reimbursement of current and ongoing litigation expenses, and service awards. The website will also be updated to include functionality for the Claim Form to be submitted online.

CONCLUSION

14. It is my opinion, based on my individual expertise and experience and that of my A.B. Data colleagues, that the proposed notice plan is designed to effectively reach potential members of the Settlement Class, will deliver plain language notices that will capture the attention of the reader, and will provide relevant information in an informative and easy to understand manner that is necessary to effectively understand the rights and

options related to the claims process and motion for interim payment of attorneys' fees and reimbursement of current and ongoing litigation expenses. This proposed notice plan conforms to the standards employed by A.B. Data in notification plans designed to reach potential class members of settlement groups or classes that are national in scope and reach narrowly defined entities and demographic targets. For all these reasons, in my opinion, the proposed notice plan satisfies due process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14th day of February 2022 in Milwaukee, Wisconsin.

A handwritten signature in black ink, appearing to read 'Eric Schachter', written over a horizontal line.

Eric Schachter

EXHIBIT A

**Class
Action
Administration**



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Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

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One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC
915 15th St., NW, Ste. 300
Washington, DC 20005
P: 202-618-2900
F: 202-462-2085


Florida
5080 PGA Boulevard, Ste. 209
Palm Beach Gardens, FL 33418
P: 561-336-1801
F: 561-252-7720

Israel
19 Weissburg Street
Tel Aviv 69358
Israel
P: +972 (3) 720-8782




CAPABILITIES

About A.B. Data


 Founded in 1981, **A.B. Data** has earned a reputation for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, 39-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Ravin Raj, Vice President-Operations, has more than 15 years of experience in class action claims management, document management, and insurance claims remediation. Mr. Raj's responsibilities for A.B. Data's Class Action Administration Company include heading the shared operations center, which includes mailroom, contact center, claims processing, quality control, and information systems operations. His areas of expertise include business process development, strategic/tactical operations

planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. In his previous position, as Assistant Vice President-Operations at RR Donnelley India Pvt. Ltd., in Chennai, India, he led a team of more than 400 employees with the capacity to process more than 4 million claims a year, servicing several leading claims administrators. Mr. Raj managed six of the top ten securities class action settlements, by settlement value, including several multibillion-dollar settlements. His background also includes work as a Project Lead for iMarque Solutions Pvt. Ltd., Chennai, India.

Linda V. Young, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Young is an expert in media planning using most forms of advertising including digital, print, and broadcast. She developed some of the first Court-approved Notice Plans using an all-digital approach for cases such as *In re Vizio Consumer Privacy Litigation*, *In re Qualcomm Antitrust Litigation*, and *In re Google Inc. Street View Electronic Communications Litigation*, among others. Her ability to create notice plans that efficiently extend reach and drive class member engagement and participation has made a significant impact across many types of administrations. Ms. Young has developed and implemented national and international print, digital-, and earned-media notice plans for some of the industry's leading pharmaceutical, insurance, and securities class action cases, including Libor-based Financial Instruments Antitrust Litigation, Cipro Antitrust Cases I and II, Euribor and Euroyen-based Derivatives cases, and many more. She has more than 20 years of general market and ethnic media advertising and media planning experience, having managed advertising for brands such as Georgia-Pacific, American Express, Denny's, and Coca-Cola USA.

Eric Schachter, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Paul Sauberer, Director of Quality Assurance, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Business Development Director, provides expertise in legal marketing strategies and brings extensive experience in client relations to A.B. Data's business development team. Previously, Mr. Parks served the legal industry as part of the marketing group at a major class action administration firm where he successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases with an estimated value of several hundred million dollars in settlement funds distributed to class members, including some of the largest Employment settlements in history. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), several of which resulted in the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Camron Assadi, Vice President, Digital Marketing, has more than 20 years of experience in digital marketing leadership, which includes directing and overseeing all aspects of the company's digital notice plans and campaigns across multiple networks and platforms. Mr. Assadi is an expert in online advertising and social media campaigns including Facebook, Google Ads, LinkedIn, Twitter, Amazon, Pinterest, Verizon Media, and others. He holds certifications in Google Ads Display and Search, and is a Facebook Certified Digital Marketing Associate. His ability to create and optimize business opportunities, extend brand reach, and capture the interest and support of local and international audiences has proven him an invaluable leader of A.B. Data's effort to maximize and streamline class member notice and engagement. Mr. Assadi has managed the notice plans for cases that have garnered millions of unique visitors and social media interactions. He holds a BS in Psychology from the University of Utah.

Adam Walter, PMP, Senior Project Manager, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Steve Straub, Senior Project Manager, joined A.B. Data in February 2012. As a Senior Project Manager, his responsibilities include developing case administration strategies, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to case counsel, overseeing notice dissemination programs, implementing complex claims processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Straub's experience in administering class action settlements includes securities, consumer, and antitrust settlements, with a primary focus on antitrust cases. He holds a Juris Doctor degree from Seton Hall University School of Law, Newark, New Jersey.

Patty Nogalski, Project Manager, is a veteran in the equity and securities industry and now contributes her talents to A.B. Data as a Project Manager specializing in class action administrations for securities litigation. Ms. Nogalski brings to A.B. Data many new ideas, methods, and technologies to achieve project efficiency and organizational integration. For much of her twenty-year career, she served as Vice President Equity Trading for BMO Global Asset Management Corporation where she managed equity trading for mutual funds and institutional accounts. She works closely with Eric Miller and the project management team to deliver strategies that meet the unique needs of securities and commodities settlements. Ms. Nogalski attended the University of Wisconsin-Milwaukee where she earned her Bachelor of Arts in Communications, and has also obtained her Financial Industry Regulatory Authority (FINRA) Series 7, Series 63, and Series 65 licenses.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol - every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. (“Lovenox Antitrust Matter”)*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*

- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*
- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

Securities Cases

- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*

- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*
- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*

- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

Labor & Employment Cases

- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. (“Dovetail Settlement”)*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons (“USP Victorville”)*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15th Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

Data Breach/BIPA Cases

- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc. ("Briggs Biometric Settlement")*
- *Trost v. Pretium Packaging L.L.C.*

Telephone Consumer Protection Act (TCPA) Cases

- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America et al.*
- *Ellman v. Security Networks*

For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from January 1, 2009, through January 12, 2021, you may be eligible to receive benefits from class action settlements.

A federal court authorized this notice. This is not a solicitation from a lawyer.

- Two settlements have been finally approved in a class action antitrust lawsuit filed on behalf of Direct Purchasers of Pork in the United States with Defendants Smithfield Foods, Inc. (“Smithfield”) and JBS USA Food Company, JBS USA Food Company Holdings, and Swift Pork Company (collectively, “JBS”) and their related or affiliated entities (collectively “Settled Defendants”). The final approved amount of the JBS settlement is \$24,500,000 and the Smithfield settlement is \$77,364,300. The total for both settlements is \$101,864,300 (the “Settlement Proceeds”).
- The Settlements with JBS and Smithfield have been given final approval by the Court and the deadline to object or opt out of these Settlements has passed. This notice informs Settlement Class Members how to make a claim to receive money from the JBS and Smithfield Settlements. Please follow the claims instructions in this notice and the attached Claim Form to receive money from the Settlements.
- The Direct Purchaser Class Representatives and Interim Co-Lead Counsel will ask the Court to award an interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards for the Class Representatives. If approved by the Court, these amounts will be deducted from the Settlement Proceeds.
- Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS FOR THE SETTLEMENTS	
FILE A CLAIM TO RECEIVE MONEY FROM THE SETTLEMENTS.	<p>In order to receive money from the Settlements you must submit a Claim Form by [REDACTED], 2022. If you are confirmed to be a Settlement Class Member and file a valid Claim Form, you will be eligible to receive a payment from the Settlement Proceeds.</p> <p>Instructions for filing a claim are available in Question 7 of this notice, on the Claim Form, and at the Settlement Website www.porkantitrustlitigation.com.</p>
COMMENT ON THE MOTION FOR INTERIM PAYMENT OF ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND SERVICE AWARDS.	<p>The motion for interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards is described in more detail in the answer to Question 11 below, and will be filed on or before [REDACTED], 2022, and available on the Settlement Website, www.porkantitrustlitigation.com. Your deadline to comment on or object to the motion is [REDACTED], 2022.</p>
DO NOTHING.	<p>If you do not file a claim as described above and in Question 7, you will receive no payment from the Settlements with any of the Settled Defendants.</p>

- Your options are explained in this notice. To file a claim, you must act before [REDACTED], 2022.

What This Notice Contains

BASIC INFORMATION..... 3

1. Why did I receive a notice?..... 3

2. What is this lawsuit about? 3

3. What if I received previous communications regarding this lawsuit? 3

WHO IS IN THE CLASS?..... 3

4. Am I part of the Class? 3

THE BENEFITS OF THE SETTLEMENT AGREEMENTS WITH JBS AND SMITHFIELD..... 4

5. What do the Settlements with JBS and Smithfield provide? 4

6. How much will my payment from the Settlements be? 4

HOW YOU GET A PAYMENT FROM THE SETTLEMENTS..... 5

7. How can I file a Claim to get a payment from the Settlements?..... 5

8. When will I get a payment from the Settlements? 5

9. What happens if I do nothing at all? 5

THE LAWYERS REPRESENTING YOU AND HOW THEY WILL BE PAID..... 5

10. Do I have a lawyer in this case?..... 5

11. How will the lawyers be paid?..... 5

12. When and where will the Court decide the motion for attorneys’ fees, costs, and service awards? 6

13. May I speak at the hearing? 6

GETTING MORE INFORMATION 6

14. How do I get more information about the Settlements? 6

BASIC INFORMATION**1. Why did I receive a notice?**

The Court authorized this notice because it has approved a process for Settlement Class Members of the JBS and Smithfield Settlements to file claims and receive their *pro rata* portion of the Settlement Proceeds. You are also being notified that Direct Purchaser Plaintiff (“DPP”) Class Representatives and Interim Co-Lead Counsel will be filing a motion for interim payment of attorneys’ fees, reimbursement of litigation expenses, and class representative service awards. If approved by the Court, these amounts will be deducted from the Settlement Proceeds.

Defendants’ records show that you may have purchased Pork products directly from one or more of the Defendants for use or delivery in the United States between January 1, 2009, and January 12, 2021. The list of Defendants is in Question 2 below.

2. What is this lawsuit about?

This class action is called *In re Pork Antitrust Litigation*, D. Minn. Case No. 0:18-cv-01776 and is pending in the United States District Court for the District of Minnesota. U.S. District Court Judge John R. Tunheim is in charge of this class action.

Direct Purchaser Plaintiffs allege that Defendants and their co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of Pork products, beginning at least as early as January 1, 2009, with the intent and expected result of increasing prices of Pork products in the United States, in violation of federal antitrust laws.

The Defendants named in Direct Purchaser Plaintiffs’ Third Consolidated Amended Complaint are producers of Pork products in the United States, as well as Agri Stats, Inc. In this notice, “Defendants” refers to JBS USA Food Company, JBS USA Food Company Holdings, Clemens Food Group, LLC, The Clemens Family Corporation, Hormel Foods Corporation, Indiana Packers Corporation, Seaboard Foods LLC, Smithfield Foods, Inc., Triumph Foods, LLC, Tyson Foods, Inc., Tyson Prepared Foods, Inc., Tyson Fresh Meats, Inc., and Agri Stats, Inc.¹

To date, Direct Purchaser Plaintiffs have reached settlements with Defendants JBS and Smithfield. The Court granted final approval to the JBS settlement on July 27, 2021, and the Smithfield settlement on January 31, 2022. The Direct Purchasers’ case is proceeding against all other Defendants besides JBS and Smithfield. Those other Defendants may be subject to separate settlements, judgments, or class certification orders. If applicable, you will receive a separate notice regarding the progress of the litigation and any resolution of claims against other Defendants.

3. What if I received previous communications regarding this lawsuit?

Notices were previously sent informing potential direct purchaser Settlement Class Members of the JBS and Smithfield Settlements. The Settlements with JBS and Smithfield have been given final approval by the Court and the deadline to object or opt out of these Settlements has passed.

If you are a Direct Purchaser Settlement Class Member and you did not opt out of the Settlements, you must submit a Claim Form by , 2022 to receive money from the Settlements. Instructions for filing a claim are available in Question 7 of this notice, on the Claim Form, and at the Settlement Website, www.porkantitrustlitigation.com.

WHO IS IN THE CLASS?**4. Am I part of the Class?**

The Court decided that, for settlement purposes, members of the Settlement Class for the JBS and Smithfield Settlements are defined as:

¹ The Court dismissed Indiana Packers Corporation from this lawsuit with prejudice, but if you purchased Pork directly from Indiana Packers between January 1, 2009, and January 12, 2021, you may be a member of the Settlement Class, and any purchases from Indiana Packers may be included in your claim.

All persons who purchased Pork directly from any of the Defendants or any co-conspirator, or their respective subsidiaries or affiliates for use or delivery in the United States from January 1, 2009, through January 12, 2021.

Specifically excluded from the Settlement Class are the Defendants; the officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir, or assign of any Defendant. Also excluded from the Settlement Class are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, and any juror assigned to this action. If you are in one of these categories, you are not a member of the Settlement Class and not eligible to participate in the Settlements.

If you satisfy these criteria and you did not file a timely and valid exclusion, then you are a member of the Settlement Class.

It is important to note that, while the Settlements are only with JBS and Smithfield, the Settlement Class includes persons who purchased Pork products (as defined in the Settlement Agreement) from *any* of the Defendants or their co-conspirators. (The Court dismissed Indiana Packers Corporation from this lawsuit with prejudice, but if you purchased Pork directly from Indiana Packers between January 1, 2009, and January 12, 2021, you may be a member of the Settlement Class.)

THE BENEFITS OF THE SETTLEMENT AGREEMENTS WITH JBS AND SMITHFIELD

5. What do the Settlements with JBS and Smithfield provide?

The final approved amount of the JBS settlement is \$24,500,000 and the Smithfield settlement is \$77,364,300. The final Smithfield settlement amount included a reduction based on the amount of Pork purchases by persons who excluded themselves from the Settlement. Collectively, the final total of the JBS and Smithfield Settlements is \$101,864,300. In addition to these monetary benefits, JBS and Smithfield have also agreed to provide specified cooperation in the Direct Purchaser Plaintiffs' continued prosecution of the litigation.

A portion of the Settlement Proceeds has been and will be used by the Settlement Administrator for notice and claims administration costs. A portion of the Settlement Proceeds will also be used to pay attorneys' fees, litigation expenses, and incentive awards that the Court chooses to award. Plaintiffs and Interim Co-Lead Counsel will file a motion by [REDACTED], 2022, in which they will seek amounts not to exceed 33 $\frac{1}{3}$ % of the Settlement Proceeds in attorneys' fees, \$5 million in current and ongoing litigation expenses, and \$25,000 in service awards for each of the 5 Plaintiffs (\$125,000 total) who are serving as Class Representatives. A copy of the motion for attorneys' fees, reimbursement of litigation expenses, and service awards will be available on the Settlement Website. The remainder of the Settlement Proceeds will be distributed to Settlement Class Members who submit a timely and valid Claim Form and who have not excluded themselves from the Settlements on a *pro rata* basis pursuant to their verified Pork purchases during the Settlement Class Period.

6. How much will my payment from the Settlements be?

To be eligible to receive a payment from the Settlements, you must complete and submit a timely Claim Form by [REDACTED], 2022. The instructions for submitting a claim are set forth in the attached Claim Form and Question 7 below.

The amount received from the Settlements by a qualified claimant will be based on a number of factors, including the number of Settlement Class Members who have filed valid claims and the amount of approved Pork purchases by each participating Settlement Class Member during the Settlement Class Period. No matter how many claims are filed, no amount of the Settlement Proceeds will be returned to the Settled Defendants.

In accordance with the Settlement Agreements, the combined Settlement Proceeds, minus Court-approved attorneys' fees, litigation expenses, and any class representative service awards and settlement administration and notice expenses (the "Net Settlement Fund"), will be distributed to Settlement Class Members on a *pro rata* basis based on the amount of approved Pork purchases by each participating Settlement Class Member.

The distribution plan, to be approved by the Court at a later date, will determine the *pro rata* amount, if any, that each Settlement Class Member will receive. The anticipated distribution plan for the Settlements is to make a *pro rata*

distribution to each qualifying Settlement Class Member based on the dollar value of approved purchases of Pork per Settlement Class Member during the Settlement Class Period.

HOW YOU GET A PAYMENT FROM THE SETTLEMENTS

7. How can I file a Claim to get a payment from the Settlements?

To be eligible to receive a payment from any of the Settlements, you must complete and submit a timely Claim Form by [REDACTED], 2022. Submit your Claim Form online at www.porkantitrustlitigation.com, by [REDACTED], 2022. Or fill out the Claim Form and mail it to the address below, postmarked no later than [REDACTED], 2022. If you do not submit a valid Claim Form by the deadline, you will not receive a payment from any of the Settlements, but you will be bound by the Court's judgment in these actions.

Your Claim Form is attached and is pre-populated to reflect the amount of your Pork purchases from each Defendant, based on a review of Defendants' records. You may use your personal Access Code listed on your Claim Form to log in at www.porkantitrustlitigation.com, where you can submit a claim and review your purchase information electronically. You can accept the purchase amounts that are pre-populated or, if you disagree with or want to supplement those amounts, you can provide additional purchase information by completing the Purchase Audit Request form posted on the Settlement Website and providing supporting documentation. All revised Pork purchaser amounts will be subject to a review process by the Settlement Administrator, Interim Co-Lead Counsel, and ultimately the Court.

You can also request that a Claim Form be sent to you by visiting the Settlement Website or by sending a written request to the Settlement Administrator by mail: Pork Antitrust Litigation, c/o A.B. Data, Ltd., P.O. Box 173117, Milwaukee, WI 53217; or by email: info@porkantitrustlitigation.com.

If you received multiple Claim Forms, you must submit each one or take other steps to ensure that all of the purchases reflected in the Claim Forms are accounted for in your submission.

If you have questions regarding your Claim Form or participating in the Settlements, contact Interim Co-Lead Counsel or the Settlement Administrator using the contact information set forth in Question 11 herein.

8. When will I get a payment from the Settlements?

Payments from the Settlements will be distributed once all of the claims are processed, any claim disputes are resolved, the Court approves the distribution plan, and any related issues are resolved. It is uncertain when this process will be completed. Settlement updates will be provided on the Settlement Website at www.porkantitrustlitigation.com or may be obtained by contacting the Settlement Administrator by phone toll-free at 1-866-797-0864. Please be patient.

9. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the JBS or Smithfield Settlements.

THE LAWYERS REPRESENTING YOU AND HOW THEY WILL BE PAID

10. Do I have a lawyer in this case?

The Court has appointed Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP as Interim Co-Lead Counsel for the Settlement Class. Their contact information in Question 11 below. If you wish to remain a member of the Settlement Class, you do not need to hire your own lawyer because Interim Co-Lead Counsel is working on your behalf.

11. How will the lawyers be paid?

You will not have to pay any attorneys' fees or costs out-of-pocket. Interim Co-Lead Counsel will file a motion by [REDACTED], 2022 in which they will seek amounts not to exceed 33⅓% of the Settlement Proceeds in attorneys' fees, \$5 million in current and ongoing litigation expenses incurred in the prosecution of this case, and \$125,000 total in service awards for the Class Representative Plaintiffs. A copy of the motion for interim payment of attorneys' fees, reimbursement of litigation expenses, and service awards will be available on the Settlement Website as of [REDACTED], 2022 and on the Court docket. The Court will determine the amount of the attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards to be paid.

If you wish to object to or comment on the motion for attorneys' fees, litigation expenses, or service awards, you must send a letter or other written statement by [REDACTED], 2022. Be sure to include your full name, the name of your business that purchased Pork, current mailing address, and email address. Your communication must be signed. You may include or attach any documents that you would like the Court to consider. Do not send your written objection to the Court or the judge. Instead, mail the objection to the Settlement Administrator, Interim Co-Lead Counsel, and the addresses listed below.

Settlement Administrator:

Pork Antitrust Litigation
ATTN: OBJECTIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

**Direct Purchaser Plaintiffs'
Co-Lead Counsel:**

W. Joseph Bruckner
Brian D. Clark
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Ave. S., Ste. 2200
Minneapolis, MN 55401
(612) 339-6900
wjbruckner@locklaw.com
bdclark@locklaw.com

**Direct Purchaser Plaintiffs'
Co-Lead Counsel:**

Clifford H. Pearson
Bobby Pouya
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Blvd., Ste. 400
Sherman Oaks, CA 91403
(818) 788-8300
cpearson@pswlaw.com
bpouya@pswlaw.com

12. When and where will the Court decide the motion for attorneys' fees, costs, and service awards?

The Court will hold a hearing on the motion for interim payment of attorneys' fees, reimbursement of litigation expenses, and class representative service awards (the "Hearing") on [REDACTED], 2022, at [REDACTED].m., at the United States District Court for the District of Minnesota, Courtroom 15, 300 South Fourth Street, Minneapolis, MN 55415. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the Hearing. Pursuant to any applicable orders relating to the COVID-19 emergency or otherwise, the Hearing may take place remotely, including via telephone or video conference. The Court may also move the Hearing to a later date without providing additional notice to the Settlement Class. Updates will be posted to the Settlement Website regarding any changes to the Hearing date or conduct of the Fairness Hearing. If you send a comment or objection, you do not have to attend the Hearing to talk about it. As long as you mailed your written objection on time, the Court will consider it. However, you are welcome to attend the Hearing at your own expense. You may also pay your own lawyer to attend, but it is not necessary.

13. May I speak at the hearing?

You may ask to speak at the Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *In re Pork Antitrust Litigation*." Be sure to include your name, including the name of your business which purchased Pork, current mailing address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked no later than [REDACTED], 2022 and it must be sent to the Clerk of the Court and Interim Co-Lead Counsel. The address for the Clerk of the Court is: 300 South Fourth Street, Courtroom 15, Minneapolis, MN 55415. The addresses for Interim Co-Lead Counsel are provided in Question 11.

GETTING MORE INFORMATION**14. How do I get more information about the Settlements?**

This notice summarizes the Settlements and claims process. More details are on the Settlement Website. You can find other important documents and information about the current status of the litigation by visiting www.PorkAntitrustLitigation.com. You may contact the Settlement Administrator at info@PorkAntitrustLitigation.com or toll-free at 1-866-797-0864. You may also contact Interim Co-Lead Counsel at the addresses, phone numbers, and email addresses provided in Question 11.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

EXHIBIT C

From: noreply@porkantitrustlitigation.com
Sent: Monday, February 14, 2022 9:55 AM
To: XXXXXXXXXXXX
Subject: Test - Notice of Class Action Settlements

EXTERNAL SENDER

Please do not reply to this email, this inbox is unmonitored.

COURT-APPROVED LEGAL NOTICE

If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from January 1, 2009, through January 12, 2021, you may be eligible to receive benefits from class action settlements.

Para una notificacion in español, llame gratis al 1-866-797-0864 o visite nuestro website www.PorkAntitrustLitigation.com.

Two settlements have been finally approved in a class action antitrust lawsuit filed on behalf of Direct Purchasers of Pork in the United States, with Defendants Smithfield Foods, Inc. (“Smithfield”) and JBS USA Food Company, JBS USA Food Company Holdings, and Swift Pork Company (collectively, “JBS”) and their related or affiliated entities (collectively “Settled Defendants”). The final approved amount of the JBS settlement is \$24,500,000 and the Smithfield settlement is \$77,364,300. The total for both settlements is \$101,864,300 (the “Settlement Proceeds”).

The Settlements with JBS and Smithfield have been given final approval by the Court and the deadline to object or opt out of these Settlements has passed. This notice informs Settlement Class members how to make a claim to receive money from the JBS and Smithfield settlements. Please follow the claims instructions in the Distribution Notice and Claim Form, available at www.PorkAntitrustLitigation.com, to receive money from the Settlements.

The Direct Purchaser Class Representatives and Interim Co-Lead Counsel will now ask the Court to award an interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards for the Class Representatives. If approved by the Court, these amounts will be deducted from the Settlement Proceeds.

WHO IS INCLUDED?

The Court decided that, for settlement purposes, members of the Settlement Class for the JBS and Smithfield settlements are defined as: All persons who purchased Pork directly from any of the Defendants or any coconspirator, or their respective subsidiaries or affiliates for use or delivery in the United States from January 1, 2009, through January 12, 2021, subject to certain exclusions. If you are not sure you are included, you can get more information, including a detailed notice, at www.PorkAntitrustLitigation.com or by calling toll-free 1-866-797-0864.

HOW CAN I FILE A CLAIM TO GET A PAYMENT FROM THE SETTLEMENTS?

To be eligible to receive a payment from any of the settlements, you must complete and submit a timely Claim Form by _____, 2022. If you do not submit a valid Claim Form by the deadline, you will not receive a payment from any of the settlements, but you will be bound by the Court's judgment in these actions.

Claim Forms for known Settlement Class Members were sent by U.S. mail and were pre-populated to reflect the amount of your Pork purchases from each Defendant, based on a review of Defendants' records. You may use your personal Unique ID listed on your Claim Form to log in at www.porkantitrustlitigation.com, where you can submit a claim and review your purchase information electronically. You can accept the purchase amounts that are pre-populated or, if you disagree with those amounts, you can challenge them by completing the Purchase Audit Request form posted on the Settlement Website and providing supporting documentation. All revised Pork purchase amounts will be subject to a review process by the Settlement Administrator, Interim Co-Lead Counsel, and ultimately the Court.

You can also request that a Claim Form be sent to you on the Settlement Website or by sending a written request to the Settlement Administrator by mail: Pork Antitrust Litigation, c/o AB Data, Ltd. PO Box 173117, Milwaukee, WI 53217; or by email: info@porkantitrustlitigation.com.

WHAT ARE YOUR RIGHTS AND OPTIONS?

You will not have to pay any attorneys' fees or costs out-of-pocket. Interim Co-Lead Counsel will file a motion by _____, 2022 in which they will seek amounts not to exceed 33 $\frac{1}{3}$ % of the Settlement Proceeds in attorneys' fees, \$5 million in current and ongoing litigation expenses incurred in the prosecution of this case, and \$125,000 total in service awards for the Class Representative Plaintiffs. A copy of the motion for interim payment of attorneys' fees, reimbursement of litigation expenses, and service awards will be available on the Settlement Website, www.PorkAntitrustLitigation.com, and on the Court docket. The Court will determine the amount of the attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards to be paid. You may object or comment on the motion for interim payment of attorneys' fees, reimbursement of litigation expenses, and service awards. The detailed Distribution Notice explains how to object. The Court will hold a hearing in this case (In re Pork Antitrust Litigation,

Case No. 0:18-cv-01776) on _____, **2022**, at __:__ __.m., to consider whether to approve the motion. You may ask to speak at the hearing, but you don't have to.

[Unsubscribe](#)

EXHIBIT D

COURT-APPROVED LEGAL NOTICE

If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from January 1, 2009, through January 12, 2021, you may be eligible to receive benefits from class action settlements.

Para una notificación en español, llame gratis al 1-866-797-0864 o visite nuestro website www.PorkAntitrustLitigation.com.

Two settlements have been finally approved in a class action antitrust lawsuit filed on behalf of Direct Purchasers of Pork in the United States, with Defendants Smithfield Foods, Inc. (“Smithfield”) and JBS USA Food Company, JBS USA Food Company Holdings, and Swift Pork Company (collectively, “JBS”) and their related or affiliated entities (collectively “Settled Defendants”). The final approved amount of the JBS settlement is \$24,500,000 and the Smithfield settlement is \$77,364,300. The total for both settlements is \$101,864,300 (the “Settlement Proceeds”).

The Settlements with JBS and Smithfield have been given final approval by the Court and the deadline to object or opt out of these Settlements has passed. This notice informs Settlement Class members how to make a claim to receive money from the JBS and Smithfield settlements. Please follow the claims instructions in the Distribution Notice and Claim Form, available at www.PorkAntitrustLitigation.com, to receive money from the Settlements.

The Direct Purchaser Class Representatives and Interim Co-Lead Counsel will now ask the Court to award an interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards for the Class Representatives. If approved by the Court, these amounts will be deducted from the Settlement Proceeds.

WHO IS INCLUDED?

The Court decided that, for settlement purposes, members of the Settlement Class for the JBS and Smithfield settlements are defined as: All persons who purchased Pork directly from any of the Defendants or any co-conspirator, or their respective subsidiaries or affiliates for use or delivery in the United States from January 1, 2009, through January 12, 2021, subject to certain exclusions. If you are not sure you are included, you can get more information, including a detailed notice, at www.PorkAntitrustLitigation.com or by calling toll-free 1-866-797-0864.

HOW CAN I FILE A CLAIM TO GET A PAYMENT FROM THE SETTLEMENTS?

To be eligible to receive a payment from any of the settlements, you must complete and submit a timely Claim Form by [REDACTED], 2022. If you do not submit a valid Claim Form by the deadline, you will not receive a payment from any of the settlements, but you will be bound by the Court’s judgment in these actions.

Claim Forms for known Settlement Class Members were sent by U.S. mail and were pre-populated to reflect the amount of your Pork purchases from each Defendant, based on a review of Defendants’ records. You may use your personal Unique ID listed on your Claim Form to log in at www.porkantitrustlitigation.com, where you can submit a claim and review your purchase information electronically. You can accept the purchase amounts that are pre-populated or, if you disagree with those amounts, you can challenge them by completing the Purchase Audit Request form posted on the Settlement Website and providing supporting documentation. All revised Pork purchase amounts will be subject to a review process by the Settlement Administrator, Interim Co-Lead Counsel, and ultimately the Court.

You can also request that a Claim Form be sent to you on the Settlement Website or by sending a written request to the Settlement Administrator by mail: Pork Antitrust Litigation, c/o AB Data, Ltd. PO Box 173117, Milwaukee, WI 53217; or by email: info@porkantitrustlitigation.com.

WHAT ARE YOUR RIGHTS AND OPTIONS?

You will not have to pay any attorneys’ fees or costs out-of-pocket. Interim Co-Lead Counsel will file a motion by [REDACTED], 2022 in which they will seek amounts not to exceed 33⅓% of the Settlement Proceeds in attorneys’ fees, \$5 million in current and ongoing litigation expenses incurred in the prosecution of this case, and \$125,000 total in service awards for the Class Representative Plaintiffs. A copy of the motion for interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards will be available on the Settlement Website, www.PorkAntitrustLitigation.com, and on the Court docket. The Court will determine the amount of the attorneys’ fees, reimbursement of litigation expenses, and Class Representative service awards to be paid. You may object or comment on the motion for interim payment of attorneys’ fees, reimbursement of litigation expenses, and service awards. The detailed Distribution Notice explains how to object. The Court will hold a hearing in this case (*In re Pork Antitrust Litigation*, Case No. 0:18-cv-01776) on [REDACTED], 2022, at [REDACTED] : [REDACTED] .m., to consider whether to approve the motion. You may ask to speak at the hearing, but you don’t have to.

EXHIBIT E

Pork Direct Antitrust Litigation
 c/o A.B. Data, Ltd.
 P.O. Box 173117
 Milwaukee, WI 53217

UNIQUE ID: _____

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Our records indicate you may be a member of the Settlement Class in this action for Settlements previously reached with Defendants JBS USA Food Company, JBS USA Food Company Holding (“JBS”), and Smithfield Foods, Inc. (“Smithfield”) (collectively, the “Settlements”). The Settlement Class, subject to certain exclusions, is defined as “All persons who purchased Pork directly from any of the Defendants or any co-conspirator, or their respective subsidiaries or affiliates for use or delivery in the United States from January 1, 2009, through January 12, 2021.”

The Court has now issued final approval for the Settlements and a claims process will now commence to distribute the Net Settlement Funds to eligible Settlement Class Members. In accordance with the Settlement Agreements, the combined Settlement Proceeds, minus Court-approved attorneys’ fees and litigation expenses, any Class Representative Service Award approved by the Court, and Settlement Administration and notice expenses (the “Net Settlement Fund”), will be distributed to Settlement Class Members on a *pro rata* basis based on the amount of Pork purchases by each participating Settlement Class Member compared to the combined Pork purchases of all participating Settlement Class Members. To be eligible to receive a payment, you must submit this Claim Form to the mailing address listed at the top of this form or on the Settlement Website www.PorkAntitrustLitigation.com by _____, 2022.

You may use your Unique ID number listed at the top of this page to log in at www.PorkAntitrustLitigation.com, where you can submit a claim and review your purchase information electronically. If your organization received more than one notice, you only need to file one Claim Form for each Unique ID.

Review your purchase information

The total award amount you receive will be calculated based on the purchase information from records available from Defendants. Your total known Settlement qualifying purchases from Defendants for the period between January 1, 2009 through December 31, 2019¹ are \$<<Total Purchases>>. The details concerning the amount of your qualifying purchases are set forth on page 2.



If you agree with the purchase information listed on Page 2, you simply need to complete the Claimant Information section on Page 3 of this Claim Form, affirm and sign the attestation also on Page 3, and submit it by _____, 2022 (postmarked or submitted online).

If you do not agree with the purchase information on Page 2 or want to supplement your claim to include 2020 and 2021 purchase data, you may complete the Purchase Audit Request form posted on www.PorkAntitrustLitigation.com and submit it with your Claim Form.

¹ Purchase information from all Defendants is only available through 2019. If you wish to include any 2020 or 2021 Settlement Class Period purchases in your claim, then please complete the Purchase Audit Request form pursuant to the instructions below.

Pork Direct Antitrust Litigation
 c/o A.B. Data, Ltd.
 P.O. Box 173117
 Milwaukee, WI 53217

PURCHASE INFORMATION

UNIQUE ID: _____

DEFENDANT/ CO-CONSPIRATOR	2009	2010	2011	2012	2013	2014	2015
Clemens							
Hormel							
JBS							
Seaboard ²							
Smithfield							
Triumph ²							
Tyson							
DEFENDANT/ CO-CONSPIRATOR	2016	2017	2018	2019			
Clemens							
Hormel							
JBS							
Seaboard ²							
Smithfield							
Triumph ²							
Tyson							

Total Purchase Amount \$<<Total Purchases>>



If you agree with the purchase information listed on Page 2, you simply need to complete the Claimant Information section on Page 3 of this Claim Form, affirm and sign the attestation also on Page 3, and submit it by _____, 2022 (postmarked or submitted online).

If you do not agree with the purchase information on Page 2 or want to supplement your claim to include 2020 and 2021 purchase data, you may complete the Purchase Audit Request form posted on www.PorkAntitrustLitigation.com and submit it with your Claim Form.

² Purchases from Seaboard, Triumph and Seaboard Triumph Foods have been generated from the same data source. If the total sales from Seaboard and Triumph reflects the amounts you have purchased from these three entities, there is no need to submit a Purchase Audit Request Form.

Pork Direct Antitrust Litigation
 c/o A.B. Data, Ltd.
 P.O. Box 173117
 Milwaukee, WI 53217

DIRECT PURCHASER ANTITRUST CLAIM FORM

UNIQUE ID: _____

If you **agree** with the purchase information on page 2, please complete the Claimant Information below and submit it by _____, 2022, (postmarked or submitted online) to the Settlement Administrator at the address listed above.

If you do **not agree** with the purchase information listed on page 2, please complete the Claimant Information below, as well as the **Purchase Audit Request form posted on the Settlement Website www.PorkAntitrustLitigation.com**, and submit them by _____, 2022, (postmarked or submitted online) to the Settlement Administrator at the address listed above, along with additional documentation to support your claim (e.g., invoices, purchase information, etc.).

If you agree with the purchase information listed on page 2 but want to supplement your claim to include 2020 and 2021 purchase data, please complete the Claimant Information below, as well as the **Purchase Audit Request form posted on the Settlement Website www.PorkAntitrustLitigation.com**, and submit them by _____, 2022, (postmarked or submitted online) to the Settlement Administrator at the address listed above, along with additional documentation to support your claim for purchases in the additional time period between January 1, 2020 and January 12, 2021 (e.g., invoices, purchase information, etc.).

Documentation must include actual receipts or invoices that include the product name, name of Defendant manufacturer, date of purchase, and net purchase amount. Please submit legible copies. Do not send originals but maintain the originals in your records.

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	_ _ _ _ - _ _ _ _ _ - _ _ _ _ _		
<u>CONTACT EMAIL ADDRESS:</u>			

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this Claim Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____ Title: _____

EXHIBIT F

Pork Direct Antitrust Litigation
 c/o A.B. Data, Ltd.
 P.O. Box 173117
 Milwaukee, WI 53217
www.PorkAntitrustLitigation.com

UNIQUE ID (printed on your Claim Form): _____

DIRECT PURCHASER ANTITRUST PURCHASE AUDIT REQUEST FORM

Please use this form if you do not agree with the purchase information pre-printed on page 2 of your Claim Form and you would like to have that information audited. Please fill out your contact information below and provide annualized purchase information on page 2.

You must submit this Purchase Audit Request Form to the mailing address listed at the top of this form or on the Settlement Website, www.PorkAntitrustLitigation.com, along with your Claim Form, by _____, 2022.

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	_ _ _ _ - _ _ _ _ - _ _ _ _ _		
<u>CONTACT EMAIL ADDRESS:</u>			

If you do not agree with the purchase information provided on page 2 of the Claim Form, you must complete the purchase information table on page 2 of this form with all Settlement Class period purchase information from January 1, 2009 through January 12, 2021. This form must reflect ALL of the purchases from the Defendants and alleged Co-Conspirators that you are claiming during the relevant time periods. You may not seek Settlement Proceeds with respect to any Settlement from which you have opted out.

If you agree with the purchase information provided on page 2 of the Claim Form but want to supplement your claim to include 2020 and 2021 purchase data, you may include the purchase information provided on page 2 of your Claim Form for the years 2009 through 2019, and add your purchase data for 2020 and January 1-12, 2021.

You must submit this form along with your Claim Form by _____, 2022, (postmarked or submitted online) to the Settlement Administrator at the address listed above, along with additional documentation to support your dispute or supplementation. Documentation must include actual receipts or invoices that include the product name, name of Defendant manufacturer, date of purchase, and net purchase amount. Please submit legible copies. Do not send originals but maintain the originals in your records.

Pork Direct Antitrust Litigation
 c/o A.B. Data, Ltd.
 P.O. Box 173117
 Milwaukee, WI 53217
www.PorkAntitrustLitigation.com

PURCHASE INFORMATION

UNIQUE ID: _____

DEFENDANT/ CO-CONSPIRATOR	2009	2010	2011	2012	2013	2014	2015
Clemens							
Hormel							
JBS							
Seaboard ¹							
Smithfield							
Triumph ¹							
Tyson							
Indiana Packers							
DEFENDANT/ CO-CONSPIRATOR	2016	2017	2018	2019	2020	2021 (1/1-1/12)	
Clemens							
Hormel							
JBS							
Seaboard ¹							
Smithfield							
Triumph ¹							
Tyson							
Indiana Packers							

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this Purchase Audit Request Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim and audit request.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____

Title: _____

¹ Purchases for Seaboard Triumph Foods, if any, should be included in purchases from Seaboard or Triumph.